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VIA ECF

The Honorable Martin Glenn
Chief Bankruptcy Judge
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, New York 10004
mg.chambers@nysb.uscourts.gov

Re: In re Celsius Networks, LLC, Case No. 22-10964 (MG)
Written Request to Make Opening Statement at Confirmation Hearing

Dear Chief Judge Glenn:

McCarter & English, LLP is counsel to the Ad Hoc Retail Group of Borrowers (the “Ad Hoc Borrowers”). The Ad Hoc Borrowers write pursuant to paragraph 1 of the *Order Establishing Case Management Procedures for the Confirmation Hearing* [ECF Doc. #3478] (the “Confirmation Procedures Order”) to request that the Court permit the Ad Hoc Borrowers to make an opening statement (the “Opening Statement”) not to exceed seven (7) minutes in support of confirmation of the *Modified Joint Chapter 11 Plan Of Reorganization Of Celsius Network LLC And Its Debtor Affiliates* [ECF Docs. ## 3319, 3577] (the “Plan”).

Respectfully submitted,

/s/ David J. Adler
David J. Adler